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United States Department of the Interior

OFFICE OF THE SECRETARY

PACIFIC NORTHWEST REGION
500 N.E. Multnomah Street, Suite 1692, Portland, Oregon 97232

ER 83/1374

April 10, 1985

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SUPERFUND BRANCH

Robert G. Courson, Chief
Superfund Branch
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Courson:

The Department of the Interior has reviewed the Final Remedial Investigation Data Report, Western Processing, Kent, Washington (EPA WA 37-OL16.1) and Feasibility Study for Subsurface Cleanup, Volume I (EPA 37-OL16.2), Volume II Appendixes (EPA 37-OL16.2), and the Executive Summary (EPA 37-OL16.2). The following comments reflect our evaluations of the alternatives presented along with our concern for adequate cleanup of all polluted sediments in Mill Creek, at and downstream of Western Processing, and for protection of treaty rights for the Muckleshoot and Yakima Tribes.

Regarding trust responsibilities and treaty rights, it should be noted that the Western Processing Site is within the Usual and Accustomed fishing grounds and stations of the Muckleshoot and Yakima Tribes. As a federal agency, EPA is charged with carrying out those responsibilities. You should be mindful throughout the decision making and clean-up processes of those responsibilities.

A review was made of the chemical data presented in the Final Remedial Investigation Report (EPA WA 37-OL16.1) of December 17, 1984. We agree with the conclusions on page L-24 indicating that "the data presently available clearly demonstrate a significant influence in the level of contamination from the study area." We reiterate that many of the substances being contributed by the Western Processing site have been determined to be detrimental to the well-being of fish and wildlife resources as stipulated in our December 1, 1983, Preliminary Natural Resources Survey, Western Processing Site, Kent, Washington (ER 83/1374). The level of metals in Mill Creek proper, and in the soil of the Kent Site, not only presents gross pollution at present, but also the potential for a continuance of polluted conditions for many years in the future. The removal of contaminated sediments from the contaminated portions of Mill Creek adjacent to and downstream of the source is essential, and replacement with clean gravels would improve habitat for aquatic life.

An examination of the Feasibility Study for Subsurface Cleanup, Volume I, Volume II Appendixes, and the Executive Summary indicates that the Remedial Action Plan, Example Alternative No. 4, appears to offer a responsible solution.

- The six-component cleanup procedure represents a combination of proven technology with a minimum adverse impact.

- The cost:benefit ratio appears balanced and offers the most assurance or guarantee for protection from recontamination by this specific site.

- The 8-year time frame procedure will offer a relatively rapid removal of solids containing toxic materials and stabilization of ground water contaminants.

- From the standpoint of resource protection, the removal of sediment from Mill Creek is paramount. This alternative incorporates example Alternative No. 7 which offers an almost immediate reduction of toxic materials being contributed to the Green River and ultimately the nearshore area of Elliott Bay in Puget Sound. In addition we would suggest that additional sampling should be undertaken to determine vertical, cross sectional and downstream extent of sediment contamination. Such analysis will provide EPA, the PRPs and other concerned agencies with information as to the extent of actual contamination and the amount of cleanup required to remove contaminated sediments to an acceptable level. Reference is made in Alternative 7 that approximately 1,700 cubic yards of material would be removed. We believe that the additional sampling for sediment contamination may well alter that amount considerably.

Thank you for the opportunity to comment on this project.

Sincerely,

Charles S. Polityka

Charles S. Polityka
Regional Environmental Officer

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